

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: VC MACON, GA, LLC
Debtor

CHAPTER 11
CASE NO. 18-04802-NPO

BANKPLUS

PLAINTIFF

VS.

ADVERSARY PROCEEDING NO. _____

J. WILSON LAFOE

DEFENDANT

**MOTION FOR EXTENSION OF TIME WITHIN
WHICH TO ANSWER OR OTHERWISE PLEAD**

COMES NOW J. Wilson LaFoe (the “Defendant”), and files this his Motion for Extension of Time Within Which to Answer or Otherwise Plead (the “Motion”), in support thereof, would respectfully show as follows, to-wit:

1. The answer to the complaint in the above styled and numbered adversary proceeding is due January 29, 2019.

2. Counsel for the Defendant has only been recently retained and has not had sufficient time to formulate a defense or other responsive pleading. Also, this adversary proceeding was just removed from the Circuit Court of Madison County to the Bankruptcy Court for the Southern District of Mississippi.

3. Defendant therefore respectfully requests that he be allowed an additional twenty (20) days within which to file an answer or otherwise respond to the complaint.

4. Other grounds to be assigned upon a hearing hereof.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that upon a hearing hereof, this Honorable Court will grant him an additional twenty (20) days within which to file an answer or otherwise respond to the complaint. Defendant prays for general relief.

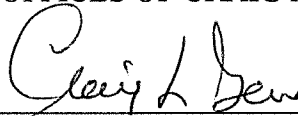
This, the 25th day of January, 2019.

Respectfully submitted,

J. WILSON LAFOE

By His Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793
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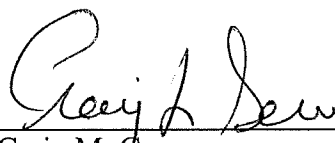
CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via electronic transmission, a true and correct copy of the above and foregoing to the following:

Ronald H. McAlpin, Esq.
Office of the United States Trustee
ronald.mcalpin@usdoj.gov

William H. Leech, Esq.
bleech@cctb.com

THIS, the 25th day of January, 2019.


Craig M. Geno